

Heritage Statement

Hampton Bathrooms
83 Station Road
Hampton
TW12 2BJ

FORM Design Group

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Our Ref: 2221

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Contents

1. Introduction
2. Policy Context
3. Conservation Area
4. Planning History
5. Impact Assessment
6. Conclusion

Introduction

1.0 Introduction

- 1.1 This Heritage Statement has been prepared in support of the Prior Notification application by Mr S Howting which is seeking confirmation that the proposed conversion of the ground floor of the existing building to 2x 1-bedroom flats is lawful.
- 1.2 Although local and national policy is not strictly relevant for such applications, the proposed development has been assessed against this to examine its impacts upon the setting of development and the conservation area within which the site resides. From this, it explains why the development is being put forward in its current form and concludes as to why the development will not have any significant impact.



FORM Design Group

Form Design Group is a multi-disciplinary practice comprising Chartered Town Planners, Architects and Civil and Structural Engineers.

Form are also specialist conservation architects with extensive experience in dealing with heritage assets

The scheme which is the subject of this application has been developed using digital surveys of the site and its surroundings and drawn up using recognised industry standard 3D design software to ensure accuracy.

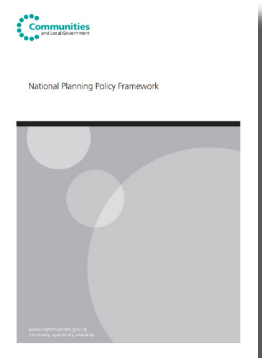
Policy Context

2.0 Policy Context

- 2.1 The current policy regime identifies, through the National Planning Policy Framework (NPPF), that applications should consider the potential impact of development on Heritage Assets. This term includes both designated heritage assets, which possess a statutory designation (for example listed buildings, conservation areas, and registered parks and gardens), as well as un-designated heritage assets.
- 2.2 The primary legislation relating to historic buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990. This requires Councils to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses (sections 16 & 66)

National Planning Policy Framework

- 2.3 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. When determining Planning Applications the NPPF directs LPAs to apply the approach of presumption in favour of sustainable development; except where this conflicts with other policies combined within the NPPF, inclusive of those covering the protection of designated heritage assets.
- 2.4 Within section 12 of the NPPF, 'Achieving Well-Designed Places', Paragraphs 131 to 141, reinforce the importance of good design in achieving sustainable development by ensuring the creation of inclusive and high quality places. This section of the NPPF affirms the need for new design to function well and add to the quality of the area in which it is built; establish a strong sense of place; and respond to local character and history, reflecting the built identity of the surrounding area.
- 2.5 Section 16, 'Conserving and Enhancing the Historic Environment', Paragraphs 195-214, relate to developments that have an effect upon the historic environment. These paragraphs provide the guidance to which local authorities need to refer when setting out a strategy for the conservation and enjoyment of the historic environment in their local plans.
- 2.6 This should be a positive strategy for the conservation and enjoyment of the historic environment and should include heritage assets which are most at risk through neglect, decay or other threats. It is also noted that heritage assets should be conserved in a manner appropriate to their significance.
- 2.7 The NPPF further provides definitions of terms which relate to the historic environment in order to clarify the policy guidance given. For the purposes of this report, the following are important:
- Heritage asset. This is 'a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions'. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).'
 - Significance. 'The value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.'
- 2.8 The NPPF advises local authorities to take into account the following points when determining planning applications:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.



Policy Context

- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality.
- The desirability of new development making a positive contribution to local character and distinctiveness.

2.9 According to Paragraph 196, plans should set out a positive strategy for the conservation and enjoyment of the historic environment.

2.10 Paragraphs 205 to 214 consider the impact of a proposed development upon the significance of a heritage asset. The NPPF emphasises that when a new development is proposed, great weight should be given to the asset's conservation and that the more important the asset, the greater this weight should be. It is noted within these paragraphs that significance can be harmed or lost through the alteration or destruction of the heritage asset or by development within its setting.

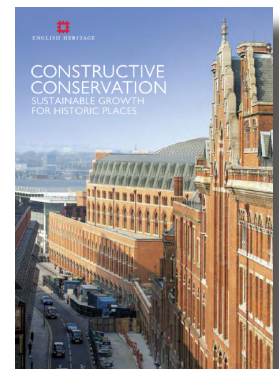
2.11 Paragraph 208 advises that where a development will cause less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including maximisation of urban land within sustainable locations.

2.12 In summary the NPPF does not promote a narrow or prescriptive attitude towards development within the historic environment, but intelligent, imaginative and sustainable approaches to managing change. English Heritage defined this new approach, now reflected in the NPPF, as 'constructive conservation'. This is defined as 'a positive and collaborative approach to conservation that focuses on actively managing change...'the aim is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure their continued use and enjoyment.'

Conservation Principles, Policies and Guidance (English Heritage, 2008)

2.13 Conservation Principles outlines English Heritage's approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in English Heritage's own advice and guidance through the planning process, the document is commended to local authorities to ensure that all decisions about change affecting the historic environment are informed and sustainable.

2.14 This document emphasises the importance of understanding significance as a means to properly assess the effects of change to heritage assets. The guidance describes a range of heritage values which enable the significance of assets to be established systematically, with the four main 'heritage values' being: evidential, historical, aesthetic and communal. The Principles emphasise that 'considered change offers the potential to enhance and add value to places...it is the means by which each generation aspires to enrich the historic environment' (paragraph 25).



The Setting of Heritage Assets (Historic England, March 2017)

2.15 Historic England's guidance on the management of change within the setting of heritage assets seeks to provide a definition for the term of 'setting' itself, as well as guidance to allow councils and applicants to assess the impact of developments upon the settings of heritage assets.

2.16 The document defines setting as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve.' Setting is also described as being a separate term to curtilage, character and context.

Policy Context

2.17 It provides guidance on practical and proportionate decision making with regards to the management of proposed developments and the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals.

Local Plan Policy & Guidance

2.18 The Adopted Local Plan is the key strategic policy for planning and development in Richmond. Policies within the Adopted Local Plan in line with National Policy and Guidance seek to enhance Richmond's varied local character.

2.19 Policy LP1 states that the high quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise.

2.20 Regarding Conservation Areas, Policy LP 3 (Designated Heritage Asset) resists demolition within Conservation Areas unless it can be demonstrated that:

1. in the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss;

2. in the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or

3. the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.

2.21 Although this application does not propose the demolition within a conservation area, or harm to a heritage asset, this policy demonstrates that it is vital to consider the planning balance.

2.22 Further to this, Policy LP 3(c) ensures that all proposals in Conservation Areas preserve and, where possible, enhance the character or the appearance of the Conservation Area.

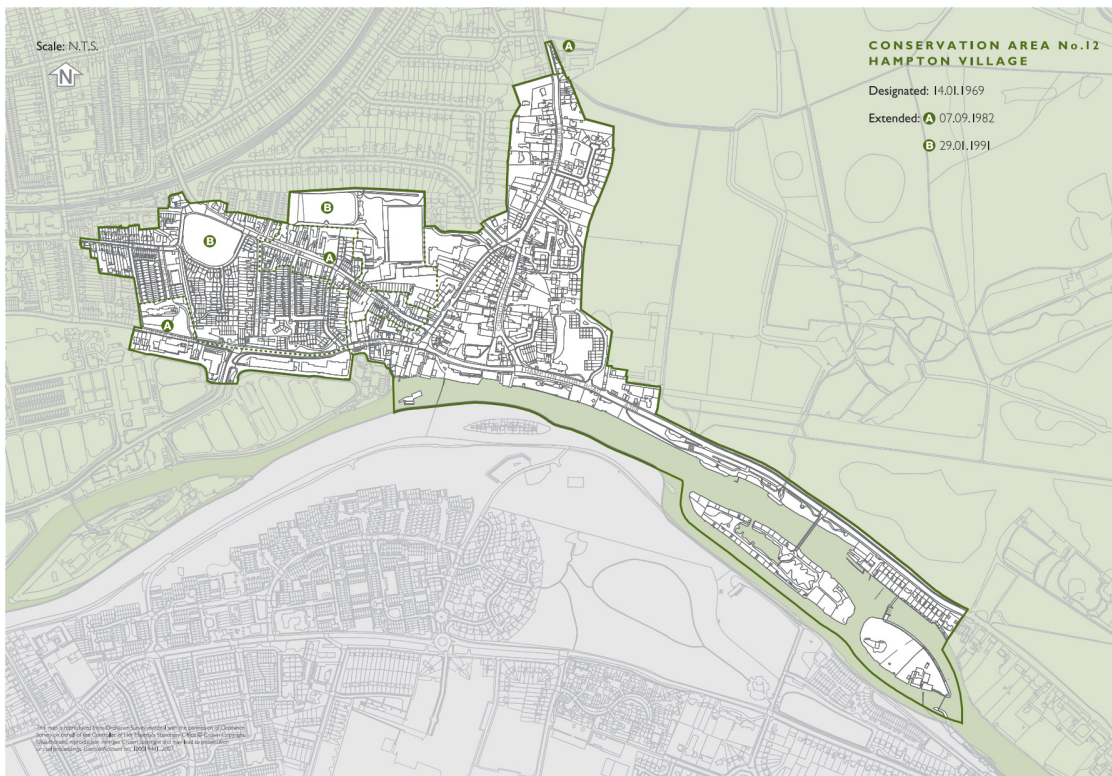
Conservation Area

3.0 Conservation Area

3.1 The Hampton Village Conservation Area 12 statement defines and records the features which make the Conservation Area important. It sets out the location and history of the Conservation Area, details the different areas of significance, and then identifies opportunities and constraints on the Conservation Area. The relevant sections are summarised below:

Location

3.2 Hampton Village conservation area is situated on the junction of the road from Sunbury to Kingston with the road north to Twickenham following the west boundary of Bushy Park. It adjoins Hampton Court Green (11) and Bushy Park (61) conservation areas to the East.



History and Development

3.3 The area's Anglo-Saxon name, which means 'settlement on the bend of the river', dates the village and there are records of a ferry crossing here since Domesday.

Character

3.4 The conservation area was originally designated to cover the heart of the old village of Hampton, in recognition of its special architectural and historic importance. It was extended to the west to include Station Road as far as Belgrade Road, an attractive tree lined street with strong village character, with a minor extension to the north.

3.5 There were further extensions in 1991, which included the Waterworks land to west and north. The conservation area is very much defined by its position on the Thames and the boundaries formed by the waterworks and Bushy Park. Designated as a priority area of archaeological potential, the area contains four distinct sub-areas. The site is located in the sub area of Station Road.

Conservation Area

Station Road

- 3.6 Station Road is composed of late 19th century mixed residential and commercial property lining the formerly named 'New Street' which was built with the arrival of the railway. The village's life now depends on the survival of the small shops, many of which have interesting shop-fronts.
- 3.7 The filter beds between Station Road and Sunbury Road are currently screened from view by ugly concrete fencing yet at the same time creates a satisfying impression of open space. A large group of 19th century unaltered properties between Rosehill and Beard's Hill is an early example of local authority housing.

Problems and Pressures

- Development pressure which may harm the balance of the river and landscape-dominated setting, and the obstruction or spoiling of views, skylines and landmarks
- Loss of traditional architectural features and materials due to unsympathetic alterations
- Loss of front boundary treatments and front gardens for car parking
- Lack of coordination and poor quality of street furniture and flooring
- Domination of traffic and poor pedestrian safety leading to clutter of signage and street furniture
- Loss of original or quality shopfronts and unsympathetic alterations and advertisement

Opportunity for Enhancement

- Improvement and protection of river and landscape setting
- Preservation, enhancement and reinstatement of architectural quality and unity
- Retain and enhance front boundary treatments and discourage increase in the amount of hard surfacing in front gardens
- Coordination of colour and design and improvement in quality of street furniture and flooring
- Improvement of highways conditions and pedestrian convenience, and rationalisation of existing signage and street furniture
- Retain and improve the quality of shopfronts advertisement

Planning History

4.0 Planning History

4.1 There is extensive planning history for the site and surrounding plots, the relevant of which are summarised in the table below.

| Reference | Address | Description | Decision |
|-------------|--------------------|---|------------------------|
| 98/2157 | 85 Station Road | Change Of Use Of Front Part Of Ground Floor From Retail To Residential As An Extension To The Existing Residential Unit. Associated Alterations To Front Elevation. | Approved 05/11/1998 |
| 00/0308 | 85 Station Road | Internal Alterations And Conversion Of Property Into Two Flats. | Approved 13/04/2000 |
| 16/1537/FUL | 85 Station Road | Convert the house into two family dwellings. | Approved 15/03/2017 |
| 03/1455/HOT | 83-85 Station Road | Erection Of Two Storey Rear Extension To Number 83 Incorporating An Additional One Bedroom Flat And First Floor Rear Extension To Number 85 | Approved 17/07/2003 |
| 13/4723/FUL | 83 Station Road | Single storey rear extension to shop. | Approved 07/04/2014 |
| 24/0260/FUL | 83 Station Road | The change of use of the ground floor and alterations to create two x 1-bedroom flats. | Refused 09/09/2024 |

4.2 In 1976, the first floor of No.83 Station Road was utilised as a self contained flat while the ground floor continued operation as Old Use Class A1 (Shop). In 2003, planning permission was granted for the two storey rear extension to No.83 which allowed for an additional self-contained one-bedroom flat on the first floor. Further to this, in 2014, permission was granted for a further single-storey rear extension providing additional space for the ground floor shop.

4.3 In 1998, the neighbouring property No.85 Station Road was granted permission for the change of use from retail to residential to create a 5-bedroom dwelling. Further permission was granted in 2017 for the conversion of this property into 1x 2-bedroom house and 1x 3-bedroom house.

4.4 Most relevant to this Prior Notification Application is application 24/0260/FUL submitted on 1st February 2024 and refused on 9th September 2024 for the following reasons:

1) In the absence of a legal agreement to secure an appropriate contribution towards of-site affordable housing, the scheme fails to address the recognised housing need and will be contrary to, in particular, to Local Plan Policy LP36, Supplementary Planning Document on Affordable Housing (2014) and the National Planning Policy Framework.

2) The scheme would result in a permanent loss of employment-generating floorspace in an Area of Mixed Use and Local Centre. In the absence of a full and proper marketing exercise to demonstrate a lack of demand for this unit and use, the scheme would be contrary to Policies LP25 and LP40 of the Local Plan (2018) and Policies 18, 21 and 22 of the new Publication Version Local Plan (Reg.19).

4.5 The scheme which was proposed under application 24/0260/FUL would have largely complied with the criteria and conditions set out under Class MA of the GDPO however at the time of submission there was a requirement for the application site to have been vacant for at least three months before the date of application. Due to this caveat, permitted development was not a viable option at this stage.

Planning History

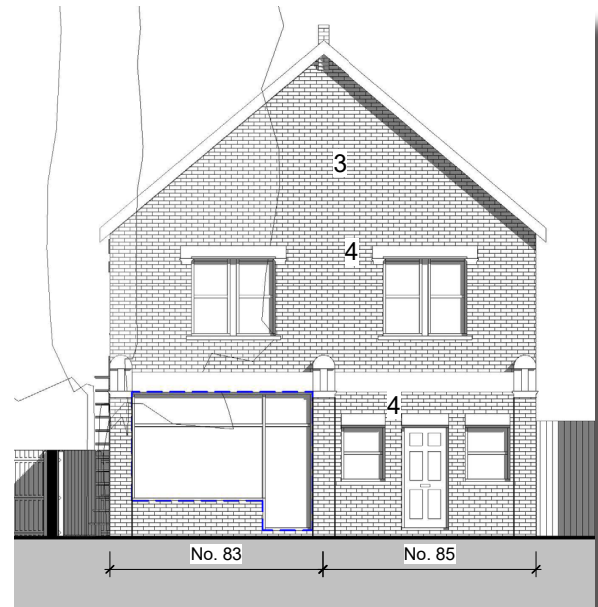
- 4.6 On the 5th March 2024 amendments to the GDPO came into force which removed this requirement. The 1,500 sqm maximum floorspace limit was also omitted. These changes now make Class MA a feasible option for the applicant.
- 4.7 It is worth noting one particular internal consultation made in relation to application 24/0260/FUL from the LBRuT Urban Design Officer.

Loss of a retail unit and shopfront is regrettable in design terms but it is considered that the proposed alterations to the front façade would, on balance, have a neutral impact on the character and appearance of the area as they would present as similar to no.85. Design revisions are recommended to relocate the entrance to the front flat to the front of the building to maintain an active frontage alongside that at no.85. New doors and window should be timber. This application is broadly in accordance with policies LP1 and LP3 and also conforms to paragraph 205 of the NPPF (2023). Design revisions are recommended to ensure full policy compliance.

- 4.8 Importantly, the Urban Design Officer did not consider that the previous scheme would impact upon the character and appearance of the area.

5.0 Impact Assessment

- 5.1 As stated, the site lies within Hampton Village Conservation Area 12 and as per Policy LP 3(c) of The London Borough of Richmond-upon-Thames Adopted Local Plan, proposals within Conservation Areas should preserve and, where possible, enhance the character or the appearance of the Conservation Area.
- 5.2 The primary elevation to consider in terms of Conservation Area merit is the north elevation which fronts Station Road. No.85 Station Road has been converted to residential as mentioned in the planning history, while No.83 is of residential use on the first floor and commercial on the ground floor.



- 5.2 In comparison to neighbouring shop fronts along the street (pictured below), No.83 Station Road appears less prominent in terms of both colour scheme and architectural design. Considering its adjacency to a ground floor dwelling, the overall structure of the building resembles that of a residential property.

Impact Assessment



- 5.4 The existing frontage is not a quality shopfront and is of low significance in terms of its contribution to the character of the area.
- 5.5 External alterations to dwellings are not permitted under Class MA applications and as such, the proposed front elevation is to remain as existing. The scheme will therefore be in-keeping with the 1900's design of the building and there will be no loss of traditional architectural features.
- 5.6 The materials and fenestration will be retained and therefore the proposed conversion will not result in unsympathetic alterations.
- 5.7 Importantly this proposal would not impact the upper parts of the building façade and will not affect any ornate elements of the adjacent building or its surroundings.
- 5.8 The rear elevation of this unit have been altered and amended over time and these proposals in terms of the rear of the application site, as well as the internal alterations to first and second floor, would have no adverse impacts upon the heritage significance of this Building of Townscape Merit.
- 5.9 During the consideration of application 24/0260/FUL the Urban Design Officer considered that the proposal would, on balance have a neutral impact on the character and appearance of the area
- 5.10 The reality is, the situation and scheme proposed under this Prior Notification is in fact better as there are now no changes proposed to the front elevation. The is also in line with the Officers comments which recommended that the entrance be relocated to the front flat to the front of the building to maintain an active frontage alongside that at no.85. Access to Flat 1 will remain from Station Road.

Conclusions

6.0 Conclusions

- 6.1 Having considered the impacts of the proposed development on the Hampton Village Conservation Area, we do not believe that the proposals will have any negative impact.
- 6.2 The proposed development is in line with Policy LP1 and LP3 of the Adopted Local Plan while the provision of additional residential units contributes to the council's aims to meet their housing targets while maximising the use of urban land.
- 6.3 Accordingly, we believe that the proposal complies with both national and local planning policy and guidance and we do not believe the scheme should be considered inappropriate on heritage grounds.